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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

John Edward Roberts,  
Plaintiff,

vs.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

Case No. 1:21-cv-00462-SKO

STIPULATION AND ORDER FOR  
EXTENSION OF TIME

(Doc. 14)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 45-day extension of time, from December 13, 2021 to January 27, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. In addition, Counsel has preplanned vacation the last two  
2 weeks of December 2021.

3 Counsel requires additional time to brief the issues thoroughly for the  
4 Court's consideration. Defendant does not oppose the requested extension.  
5 Counsel apologizes to the Defendant and Court for any inconvenience this may  
6 cause.

7  
8 Respectfully submitted,

9 Dated: October 29, 2021 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Jonathan Omar Pena  
12 JONATHAN OMAR PENA  
13 Attorneys for Plaintiff  
14

15 Dated: October 29, 2021 PHILLIP A. TALBERT  
16 Acting United States Attorney  
17 DEBORAH LEE STACHEL  
18 Regional Chief Counsel, Region IX  
19 Social Security Administration  
20

21 By: \*/s/ Sarah E. Preston  
22 Sarah E. Preston  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on October 29, 2021)  
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**ORDER**

Based upon the foregoing stipulation of the parties (Doc. 14), and for good cause shown (Fed. R. Civ. P. 16(b)(4)), IT IS HEREBY ORDERED, that Plaintiff shall have an extension of time, to and including January 27, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 13) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **November 2, 2021**

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE